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Attorneys for Timothy W. Gleason, Miriam  
 Gleason, and Luke Gleason

UNITED STATES BANKRUPTCY COURT  
 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

In re  
 PG&E Corporation,  
 and  
 PACIFIC GAS AND ELECTRIC  
 COMPANY,  
 Debtors.

☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

\*All papers shall be filed in the Lead Case,  
 No. 19-30088-DM

Case No. 19-30088-DM

Chapter 11

**DECLARATION OF RICHARD  
 FRANKEL IN SUPPORT OF MOTION  
 PURSUANT TO FED. R. BANKR. P.  
 9006(b)(1) TO ENLARGE THE TIME TO  
 FILE PROOF OF CLAIM**

Date: August 23, 2022  
 Time: 10:00 a.m.  
 Court: Courtroom 17  
 450 Golden Gate Avenue  
 San Francisco, CA 94102  
 Judge: Hon. Dennis Montali

Objection deadline: August 16, 2022  
 4:00 p.m. (Pacific Time)

I, Richard Frankel, declare as follows:

1. I am an attorney at law duly licensed to practice before the courts of the State of  
 Texas and numerous federal courts. I am a lawyer with Reiner, Slaughter, Mainzer & Frankel  
 LLP, one of the counsel for Movants. I have personal knowledge of the facts stated in this  
 declaration and, if sworn as a witness, could and would competently testify thereto.

2. I am over eighteen years of age, of sound mind, and fully competent to make this  
 declaration. All statements in this declaration are based on my own personal knowledge and

1 observation and from my review of the court and business records in this case, or upon  
2 information and belief when indicated. If called to testify on this matter, I can and will  
3 competently testify to the matters set forth in this declaration.

4 3. My law firm represents wildfire victims who sustained losses from the Camp Fire  
5 in 2018. My firm has timely filed over 800 proofs of claim with Prime Clerk for losses clients  
6 suffered as a result of these fires.

7 4. Timothy W. Gleason, Miriam Gleason, and Luke Gleason (together, "Movants")  
8 contacted my office on or about July 10, 2022.

9 5. The extended December 31, 2019 Claims Bar Date in the jointly administered  
10 bankruptcy cases of PG&E Corporation and Pacific Gas and Electric Company has passed.

11 6. As soon as I became aware that no proof of claim was filed for Movants, my firm  
12 began preparing Movants' proof of claim and sought assistance of local counsel to file this  
13 Motion.

14 7. Movants owned and lived on residential real property commonly known as 4700  
15 Zephyr Point Road, Paradise, California (the "Property"). The Property, including the residence  
16 and surrounding vegetation, was severely damaged by the Camp Fire.

17 8. At the time of the Camp Fire, Timothy Gleason and Miriam Gleason lived on the  
18 Property with their then-teenage son Luke Gleason. Movants suffered emotional distress from  
19 fleeing the fire and being displaced from their home.

20 9. Movants delayed in timely filing a proof of claim because the extreme trauma of  
21 the fire has made it nearly impossible for Movants to deal directly with the consequences of the  
22 Camp Fire, including potential litigation.

23 10. The Fire Victim Trust has only completed determinations on approximately 60% of  
24 all claims filed.

25 11. I am advised that the trustee is not going to oppose this Motion.

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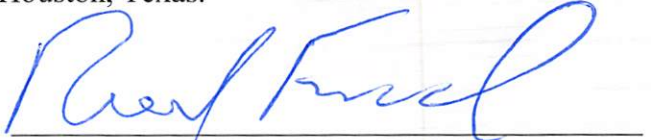
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1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing is true and correct.

3 Executed this 22nd day of July, 2022, in Houston, Texas.

4  
5 By:



RICHARD FRANKEL

DOWNEY BRAND LLP